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ACT/019/012  
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JIM

SEP 21 1982

September 17, 1982

Mr. James W. Smith Jr.  
Coordinator Mined Land Development  
State of Utah  
Natural Resources & Energy  
Oil, Gas & Mining  
4241 State Office Building  
Salt Lake City, Utah 84114

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DIVISION OF  
OIL, GAS & MINING

Re: Permitting  
Westwater, Inc.  
ACT/019/012  
Grand County, Utah

Dear Mr. Smith:

The following is submitted for your perusal:

Rule M-3 (1) - (d)

a. due to the depth (20 - 30 feet) of the initial mining area, the first three years should not cover more than fifteen acres or five acres per year (estimated).

Rule M-3 (1) (e)

The natural flow of the existing drainage running through the area to be stripped will be divided in two parts. Looking towards the mining area from the roadway leading to Westwater, the drainage runs from West to the Easterly direction. On the East end of the projected mining area is a deep gully (outside of the Claim Area) and it will take care of any flash flood condition that could cause topsoil or humates loss, provided soil and humates are kept away from the low area. Care will be taken to ensure that the cap rock dyke that we create on site will be sufficient to prevent any major soil runoff.

Rule M-3 (2) (c)

Depth of available top soil, varies according to the steepness of the Humate Mound, however, the average available topsoil based on cursory analysis based on the four inches required, without the addition of Humates, there are sufficient material to meet the needs of revegetation. The length of time of topsoil to be stockpiled could run from a year to two years for a given area. The deeper the Humate content in a specified area will require the topsoil to be stockpiled for a longer period of time, however, we intend to devise a method to revegetate the mined area progressively, whereby, the barren area will not be left longer than necessary and at the same time using the equipment available on site, work the revegetation requirements on a partial basis.

continued

Portions of say five acres could be graded and seeded with topsoil in place, minimizing potential loss due to extreme weather conditions. Also, realizing that the planting season is limited, timing for such application will be utilized. See attached sketch.

The BLM stipulations of seeding the topsoil if not used within one year will be followed.

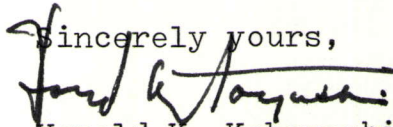
Rule M-3 (2) (3)

We'll contact the BLM in Moab to send the required information to Your office.

Rule M-10 (14)

We'll notify the BLM regarding this with instructions to transmit the required information to your office.

Trusting the above meet your requirements, together with subsequent submissions by the BLM.

Sincerely yours,  
  
Harold K. Kobayashi  
President  
Westwater, Inc.

Temporary address:

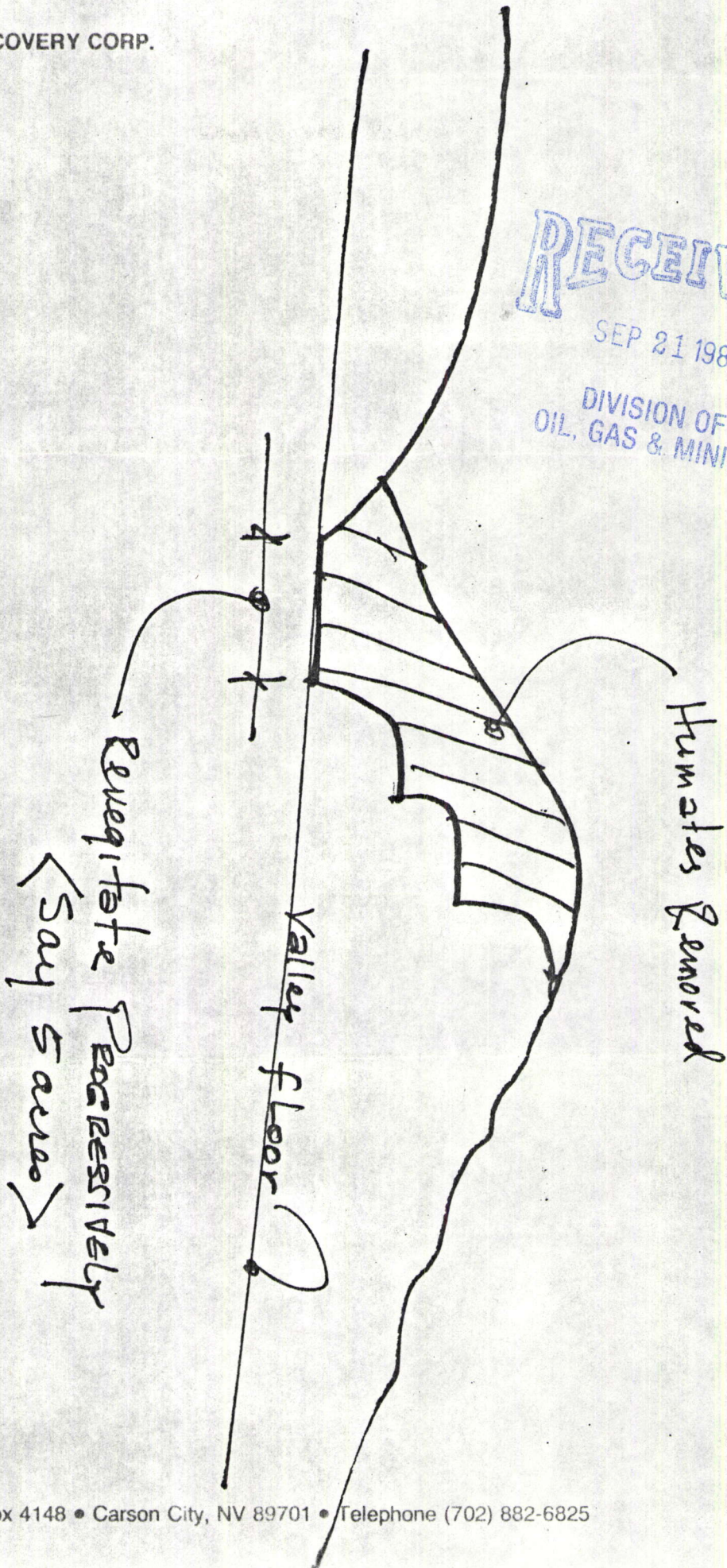
Harold K. Kobayashi  
98-1617 Piki Street,  
Aiea, HI 96701  
Phone: 808) 488-4731

cc: Gerald Turner



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Note: Soil TREATMENT that may be difficult to monitor due to terrain cut. More top soil is removed and stored for brush & cap rock must be removed early in the mining process prior to removal of any humates.



Rule M-3 (1)(a) - (d)

b. Applicant still must submit a best estimate on the amount of acreage to be disturbed on a year-by-year basis, for the purpose of knowing how much area will be reclaimed per year and how long topsoil will be stored.

Rule M-3 (1)(e)

a. The recently submitted topo map shows a drainage running right through the area to be stripped. Please indicate how this drainage will be rerouted during mining or, at a minimum, how erosion of topsoil and/or humate material will be controlled.

Rule M-3(2)(c)

Depth of available topsoil, depth to be replaced, volume of topsoil to be stored at any one time and length of topsoil stockpiling still have not been adequately addressed. It is suggested that a running total of soils removed, replaced and stockpiled be kept in a format such as that attached here as the last page. Please indicate if this would be acceptable.

Applicant should also make a firmer commitment to protection of stored topsoil (i.e. seeding or some other suitable method of protection if soil will not be used in the near future). It was indicated that topsoil would be seeded if stored for more than two years, while the BLM stipulations require seeding if the topsoil is not used within one year. This should be corrected.

Rule M-3(2)(3)

The Division has not yet received any information relating to baseline studies of the native vegetation in or near the permit area. An approved vegetation standard must be submitted before any permit approval will be given.

Rule M-10(14)

Soils testing must be done prior to any revegetation occurring. All tests indicated in the Division's June 2, 1982, review letter should be performed to determine if any soil amendments, other than humates, are needed. At the same time that soils testing data is submitted, the applicant should submit data on what specific amendments (including humates) will be used, in specific amounts. A "test plot" approach to revegetation (i.e. trying different soil treatments and vegetation treatments) could be undertaken since the area will be revegetated in small increments. A firm commitment to the above testing must be made prior to permit approval.

Baseline soil survey information, which was indicated to be available at the July 12, 1982, meeting, has not yet been submitted by the applicant.

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